

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

(1) JERI GILL MCKENZIE and)
(2) ROBERT MCKENZIE,)
Plaintiffs,)
))
vs.) **Case No. 21-CV-258-RAW**
))
(1) THE HANOVER INSURANCE)
COMPANY, INC.,)
Defendant.)

**DEFENDANT THE HANOVER INSURANCE COMPANY'S
FINAL WITNESS LIST**

COMES NOW Defendant, The Hanover Insurance Company, Inc., and pursuant to the Court's Scheduling Order [Dkt. #15] submits its following Witness List:

WITNESSES

EXPECT TO CALL		
No.	Name & Contact Info	Subject of Information
1.	David Goldsholl 36 Ivers Drive Little Rock, AR 72223	Plaintiffs' claim for benefits; his discussions with Plaintiffs' agents, representatives, and others; his handling, investigation, and evaluation of claim; written communications with Plaintiffs and others; bases for coverage decision and coverage afforded by policy.
2.	Jeri Gill McKenzie Robert McKenzie c/o Foshee & Yaffe P.O. Box 890420 Oklahoma City, OK 73189	The facts and circumstances surrounding Plaintiffs' claim for benefits and theories asserted in this case; the condition of the building, maintenance and prior claims of the subject property; any hailstorms which impacted the property; prior repairs made on the building; estimates submitted by Plaintiffs; communications regarding claim.
3.	Korbin Leach Ladder Now 3600 Chamberlain Lane, Ste. 736 Louisville, KY 40241	His inspection of the property and his observations, discussions, and reporting related thereto.
4.	Corbin Swain, P. E. Day Engineering Consultants LLC P.O. Box 1405 Jenks, OK 74037	His inspection of the property and his observations, conclusions, discussions, and reporting related thereto; his experience and knowledge.

EXPECT TO CALL		
No.	Name & Contact Info	Subject of Information
5.	Defendant's Claim Handling Expert	To be identified pursuant to the Court's Scheduling Order
6.	Defendant's Structural Engineer Expert	To be identified pursuant to the Court's Scheduling Order
7.	Bill Dunn Dunn Roofing 714 10 th Ave NW Ardmore, OK 73401	His inspection of the property and his observations, conclusions, discussions, and reporting related thereto.

MAY CALL		
No.	Name & Contact Info	Subject of Information
8.	Keller Claxton City of Ardmore Dept. of Development Services 23 S. Washington Street Ardmore, OK 73401	The facts and circumstances surrounding the May 2019 code violation regarding damage caused by the 2019 fire; his inspection of the property and his observations, conclusions, discussions, and reporting related thereto.
9.	Chad Mansfield Ardmore Fire Department 115 N. Rockford Road Ardmore, OK 73401	The facts and circumstances surrounding the actions taken by the fire department at the 2019 fire; damage to Plaintiff's roof as a result of the fire.
10.	Brian McCarty Service First Roofing 1407 Broadway Street Ardmore, OK 73401	His inspection of the property and his observations, conclusions, discussions, and reporting related thereto.
11.	Deforest Michael York	His inspection of the property and his observations, conclusions, discussions, and reporting related thereto.
12.	Records Custodian City of Ardmore	Authentication of records
13.	All other necessary records custodians for identification or authentication of documents.	Authentication of records
14.	Witnesses whose identity may be discovered through ongoing discovery.	
15.	Any witness necessary for rebuttal.	

Respectfully submitted,

s/Grant A. Fitz

Grant A. Fitz, OBA #19806

RICHARDS & CONNOR

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ATTORNEY FOR DEFENDANT

HANOVER INSURANCE COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of July 2022, I electronically transmitted the attached to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following:

Terry M. McKeever, Esq. - tmm@fylaw.com
FOSHEE & YAFFE

Preston James Dugas, III, Esq. – pdugas@dcclawfirm.com
DUGAS CHEEK & CIRCELLI

ATTORNEYS FOR PLAINTIFFS
JERI GILL MCKENZIE AND
ROBERT MCKENZIE

s/Grant A. Fitz